

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

LEROY WILLIAMS,

Plaintiff,

v.

**STATE OF ALABAMA DEPT. OF
TRANSPORTATION, et. al.
Defendant.**

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**Civil Action No.:
2:06-cv-658-ID**

JURY DEMAND

REPORT OF PARTIES' PLANNING MEETING

Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on **August 28, 2006**, with participation by the following:

RUSSELL ADAMS on behalf of plaintiff, Leroy Williams

ANDREW REDD on behalf of defendants, Alabama Department of Transportation and Joe McInnes.

1. **Pre-Discovery Disclosures.** The parties will exchange by **September 30, 2006** the information required by Rule 26.

2. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects:

- (a) factual information concerning the alleged discriminatory treatment and termination of the plaintiff;
- (b) any and all damages claimed by the plaintiff;
- (c) plaintiff's employment history and work performance;
- (d) general issues of liability; and
- (e) any and all issues raised in the pleadings, including affirmative defenses;
- (f) factual information concerning the defendants' basis for the

plaintiff's termination.

3. All discovery commenced in time to be completed by **May 1, 2007**.
4. **Interrogatories:** Maximum of **25** interrogatories by each party to any other party. Responses to all Interrogatories are due **30** days after service.
5. **Requests for Production:** Maximum of **40** requests for production by each party to any other party. Responses to all Requests for Production are due **30** days after service.
6. **Requests for Admission:** Maximum number of **25** Requests for Admission by each party to any other party. Response to all Requests for Admissions are due **30** days after service.
7. **Depositions:** Maximum of **10** depositions by each party, each deposition to be limited to a maximum of 7 hours unless extended by agreement of the parties.
8. Reports from retained experts under Rule 26(a)(2) due:
From the plaintiff by **January 15, 2007**
From the defendant by **February 15, 2007**
9. **Supplementation under Rule 26.** All supplementation under Rule 26 will be due immediately upon discovering additional information, with final supplementation due within **30** days of the discovery deadline.
10. **Other Items.**
 - a. **Scheduling Order Conference:** The parties do not request a conference with the court before entry of the scheduling order.
 - b. **Additional Parties:**
 1. The plaintiff should be allowed until **November 1, 2006** to join additional parties and to amend the pleadings.
 2. The defendant should be allowed until **December 1, 2006** to join additional parties and to add defenses and amend the pleadings.
11. All potentially dispositive motions should be filed by **June 1, 2007**.
12. The parties request a final pretrial conference after the close of discovery.
13. Final lists of trial evidence under Rule 26(a)(3) should be due:

- a. From the plaintiff: witnesses and exhibits by 30 days before trial;
- b. From defendant: witnesses and exhibits by 30 days before trial;
- c. Parties should have 14 days after service of final lists of trial evidence to list objections under Rule 26(a)(3).
- d. The case should be ready for trial by August 2007 and, at this time, is expected to take approximately 2 to 3 days.

Respectfully submitted,
s/ Russell W. Adams
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Attorney for Plaintiff

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